

Department of Natural Resources Division of Oil, Gas and Mining

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Dear Sirs:

State of Utah

While reading the "Proposed Changes to the General Rules and Regulations," promulgated by the Division of Oil, Gas and Mining, I noted two specific subjects on which we need further information or data in the event the proposed changes become regulations. The questions I have are both included in Rule M-10 - Reclamation Standards, Section 13 - Revegetation. We are giving preliminary consideration to establishing several test plots (mostly in pinyon-juniper and Ponderosa Pine communities) on dozed roads and drill pads.

In part (2)(a) reference is made to "professionally accepted inventory methods...approved by the Division." Would you please list and/or define which vegetation inventory methods are presently approved by the Division, e.g., ring step, transect, etc?

Part (4) states that, "Test plots established by the operator in consultation with the Division shall demonstrate..." Does the Division have standardized test plot dimensions and other criteria which are required or is each test site considered independently? It would be especially helpful if you could provide the recommended dimensions and number of replications needed for each plot if you have established them yet, or if you can offer any suggestions that would help us in designing our own test plots.

Your assistance in this matter will be greatly appreciated.

Yours truly,

Fred Gerdeman